



Oregon

Theodore Kulongoski, Governor

Department of Environmental Quality

Northwest Region Portland Office

2020 SW 4th Avenue, Suite 400

Portland, OR 97201-4987

(503) 229-5263

FAX (503) 229-6945

TTY (503) 229-5471

RECEIVED

October 14, 2010

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also sent via e-mail

Mr. Ted McCall
McCall Oil and Chemical Corporation
5480 NW Front Avenue
Portland, OR 97210

Environmental
Cleanup Office

RE: DEQ comments for the McCall Oil and Chemical Corporation *Source Control Data Gaps Workplan*, August 2010
ECSI #134

Dear Mr. McCall:

DEQ has completed the review of the *Source Control Data Gaps Workplan* (the WP) for the McCall Oil and Chemical Corporation Site in Portland, Oregon. DEQ has provided the following comments.

General Comments

The WP provides a plan consistent with DEQ's requests for additional information to support a source control evaluation (SCE). The following sections provide specific comments to move forward with the WP tasks.

Specific Comments

1. Section 2.1, Page 4

DEQ requests that the stormwater drainage map also include a discussion of current/historical operations of each drainage area and an evaluation if sampling locations are sufficient for the SCE.

2. Section 2.6, Page 4

DEQ will provide review and comments for the stormwater and sediment sampling results submitted on July 23, 2010 as part of the review of the pending SCE report.

3. Section 3.1, Page 5

Please include analyses for TPH (gas, diesel, and oil) and total metals for all pore water samples collected to allow for the evaluation of the relationship of TPH induced reducing conditions to arsenic mobility to groundwater.

4. Section 3.1, Page 5, Third Paragraph

The specific locations identified for pore water sample collection "along the shoreline where shallow groundwater discharges to the river" is not supported by proof of groundwater seepage or technical review of existing data.

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DEQ requests the following supporting information be discussed with DEQ to confirm pore water sample locations:

- Perform field reconnaissance during low tide/river level to identify the locations of shallow groundwater seeps along the shoreline transition zone.
- Further characterization of the lithology separating the fill and alluvial zones in relation to seasonal groundwater levels to accurately locate the sample locations.
- Perform a review of seasonal river stage and tide fluctuations relative to proposed sampling locations.
- Establish horizontal and vertical control coordinates using GPS to establish conditions evaluated above and direct sampling activity.

5. Section 3.1, Page 6, Third Paragraph

Please indicate on the Sample Location Map (Figure 1) all river sample locations with unique symbols/identifiers that cross-reference Table 1.

6. Section 3.1, Page 6, Final Paragraph

Please modify the proposed one casing volume sampling requirement. The typical industry standard and EPA guidance requires a minimum of three casing volumes and/or the stabilization of measured field parameters.

7. Section 3.3, Page 8

DEQ request the analysis of one additional composite sample collected from the area between EX-5 and MW-5 in order to fully represent the site bank conditions.

8. Section 3.4, Page 8

Please include analyses for TPH (gas, diesel, and oil) and total metals for the monitoring well water samples to allow for the evaluation of the relationship of TPH induced reducing conditions to arsenic mobility to groundwater.

9. Section 4, Pages 9 through 12

The Quality Assurance and Quality Control Sections do not meet the typical requirements. Please revise this section to provide the following issues identified below:

- Provide specific laboratory methods with holding times, sample preservation, and container specifications.
- Provide specific laboratory methods, with reporting limits and screening level value comparisons.
- Provide information identifying data quality indicators, laboratory quality control, and performance requirements.

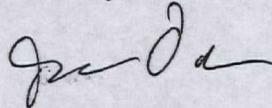
10. Section 5, Page 12

DEQ requests that a summary of the results of the proposed investigation be provided to DEQ for review prior to preparation of a SCE report. Review and or Approval of the SCE report will require a minimum of 60 days to allow both DEQ and EPA review and comment.

If the comments discussed above are acceptable, please proceed with the work. A work plan with the requested modifications may be submitted 30 days following receipt of this letter. The information requested to support the porewater sampling locations (Comment #4) should be discussed with DEQ before sampling.

Please call (503) 229-5039, if you have questions.

Sincerely,



Jim Orr, R.G.
Project Manager
NW Region Cleanup Section

cc: Tom Gainer, DEQ NWR
Karen Tarnow, DEQ NWR
Ken Thiessen, DEQ NWR
Mike Poulsen, DEQ NWR
Rod Struck, Portland BES
Tim Dean, Portland BES
Kristine Koch, EPA
John Renda, Anchor Environmental